

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

GRACE LAWRENCE)	
)	
Plaintiff,)	
vs.)	
)	Civil Action No. 02-CV-4440
TRANS UNION, LLC)	
)	
and)	
)	
CITY OF PHILADELPHIA)	
)	
Defendants.)	
)	

ORDER

AND NOW, this day of 2003, upon consideration of Plaintiff Grace Lawrence's Motion for Leave to File a Sur-Reply Memorandum in response to Defendant Trans Union, LLC's Reply is Further Support of Its Motion for Summary Judgment, it is hereby ORDERED that the Motion is GRANTED. Plaintiff's Sur-Reply Memorandum of Law, attached as Exhibit A to his Motion, is deemed filed of record.

_____ Brody,	_____ J.
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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

GRACE LAWRENCE

Plaintiff,

VS.

TRANS UNION, LLC

and

CITY OF PHILADELPHIA

Defendants.

Civil Action No. 02-CV-4440

**PLAINTIFF’S MOTION FOR LEAVE TO FILE A SUR-REPLY MEMORANDUM OF
LAW IN RESPONSE TO DEFENDANT TRANS UNION, LLC’S REPLY
IN FURTHER SUPPORT OF ITS MOTION FOR SUMMARY JUDGMENT**

Plaintiff Grace Lawrence, through undersigned counsel, hereby moves this Court for leave to allow her to file the attached Sur-Reply Memorandum of Law in response to Defendant Trans Union, LLC's ("TU") Reply in Further Support of Its Motion for Summary Judgment in the above matter. Good cause exists for the filing of this attached Sur-Reply as Trans Union inappropriately raised new facts in its Reply, including new third party declarations from Superior Information Services. Since these facts were not raised initially, Plaintiff was deprived of an opportunity to respond. Additionally, TU's Reply discusses recently-issued authority from the Eastern District of Pennsylvania, which Plaintiff has not had the opportunity to brief because it was not yet published at the time of Plaintiff's Opposition. A copy of the proposed Sur-Reply Memorandum is attached hereto as Exhibit A. For the above reasons, as well as the reasons set

forth in Exhibit A, Plaintiff should be permitted to have her Sur-Reply Memorandum deemed filed of record.

Respectfully submitted,

FRANCIS & MAILMAN, P.C.

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Dated: August 21, 2003